

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

U.S. BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR BANC OF AMERICA
FUNDING 2009-FT1 TRUST, MORTGAGE
PASS-THROUGH CERTIFICATES,
SERIES 2009-FT1

VS.

CASE No. 1:17-CV-00203

CARLETON N. BONOLLO, JOANNE
M. BONOLLO f/k/a JOANNE MARIE
SALISBURY and CITIZENS BANK,
NATIONAL ASSOCIATION

**ANSWER OF DEFENDANT, CITIZENS BANK, NATIONAL ASSOCIATION,
TO THE PLAINTIFF'S COMPLAINT**

The defendant, Citizens Bank, National Association, for answer to the plaintiff's complaint hereby states the following:

FIRST DEFENSE

INTRODUCTION

Said Defendant neither admits nor denies the allegations contained in the Introduction.

PARTIES

Said Defendant neither admits nor denies the allegations contained in paragraphs 1, 2 and 3.

Defendant admits the allegations contained in paragraph 4.

JURISDICTION AND VENUE

Defendant neither admits nor denies the allegations contained in paragraph 5.

Defendant admits the allegations contained in paragraphs 6.

FACTS

Defendant neither admits nor denies the allegations contained in paragraphs 7, 8, 9, 10, 11, 12, 13, 17, 18, 19, 20, 21, 22, 23 and 24.

Defendant admits the allegations contained in paragraph 15.

Defendant denies the allegations contained in paragraphs 14 and 16.

COUNT I

FOR DECLARATORY JUDGMENT

Defendant hereby incorporates by reference its answers to paragraphs 1 through 24.

Defendant denies the allegations contained in paragraph 26.

COUNT II

FOR DECREE BARRING ALL RIGHTS OF REDEMPTION AND VESTING TITLE

IN THE PLAINTIFF FREE OF ALL CLAIMS

Defendant hereby incorporates by reference its answers to paragraphs 1 through 24.

Defendant denies the allegations contained in paragraph 28.

COUNT III

FOR AN ORDER OF SALE

Defendant hereby incorporates by reference its answers to paragraphs 1 through 24.

Defendant denies the allegations contained in paragraph 30.

/s/ Ryan C. Hurley

Ryan C. Hurley, Esq. (#7539)
Kiernan, Plunkett & Redihan
91 Friendship Street
Providence, RI 02903
(401) 831-2900

Said defendant hereby requests a trial by jury.

/s/ Ryan C. Hurley
Ryan C. Hurley, Esq. (#7539)
Kiernan, Plunkett & Redihan

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CERTIFICATE OF SERVICE

I hereby certify that, on the 31st day of May, 2017:

[X] I electronically filed and served this document through the electronic filing system with notice to the parties listed above. The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Kathleen Craig